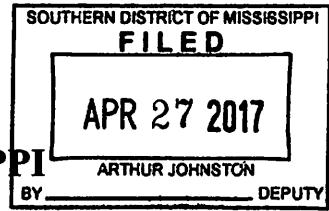


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE)
)
)
v.) CIVIL ACTION NO. 1:15cv382-HSO-JCG
)
VAUGHN PERRET, CHARLES LEARY &)
DANIEL ABEL, D/B/A/ TROUT)
POINT LODGE LTD OF NOVA SCOTIA)
& IN THEIR INDIVIDUAL CAPACITIES)
PROGRESS MEDIA GROUP LIMITED,)
MARILYN SMULDERS & ASHOKA)
)

**MOTION FOR AN EXTENSION OF TIME TO SERVE SUMMONS ON DEFENDANT
TROUT POINT LODGE, LTD**

Plaintiff Douglas Handshoe respectfully moves the Court for an extension of an additional six weeks of time in which to file the summons return for Trout Point Lodge, Limited of Nova Scotia.

For reasons more fully set out in the accompanying Memorandum in Support of this Motion Defendant Trout Point Lodge, Limited is a Canadian Limited Company with its registered office in Nova Scotia, Canada thus it is not subject to the time limits for service of a summons contained in Federal Civil Procedure Rule 4(m). Additionally, Trout Point Lodge, Limited's registered office is located on a gated, private road within the larger Trout Point Lodge development, which was closed for the winter season on or about November 1, 2016 and is not scheduled to reopen until May 13, 2017.¹ No other party will be prejudiced by the granting of the requested relief, which is not sought for delay or improper purpose but so that justice may be accorded the parties.

¹ Please see attached Exhibit 1, Printout of Trout Point Lodge's website dated April 25, 2017 which lists the 2017 opening date as May 13, 2017.

In view of the foregoing, Plaintiff prays the Court would grant him a six week extension of time to serve the summons and file the return with this Court.

Respectfully submitted this 27th day of April, 2017,



Douglas Handhoe, Plaintiff
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CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on April 27, 2017, the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

Respectfully submitted this 27th day of April, 2017,



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